

**REMARKS**

The Office Action mailed September 15, 2008 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-11, 13-16, and 18-30 are now pending in this application. Claims 12 and 17 have been canceled. Claims 1-30 stand rejected.

Claims 1-30 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,853,867 to Klindt et al. (hereinafter referred to as "Klindt") in view of U.S. Patent No. 6,732,191 to Baker et al. (hereinafter referred to as "Baker"). Applicants respectfully traverse this rejection.

Klindt describes an apparatus for accessing, controlling and monitoring a programmable logic controller with a network client having a conventional web browser. The apparatus includes an archive, an interface, and a library. The archive compiles an application written in code supported by the web browser. The interface responds to the application for establishing a connection between the controller and the network client. Further, the library responds to the application for supporting communication between the controller and the network client upon establishing a connection therebetween. The Examiner indicates on page 3 of the Office Action that the network interface (alleged network module) described in Klindt is located within computer 16. In contrast, the network module of the presently claimed invention is located outside of a computer. Further, server 12 (alleged web server and database module) allows internet access to information (e.g., web pages) stored in a program and logic controller 14 that is located outside of the server 12. In contrast, the web server and database module of the presently claimed invention includes a database that stores a file (e.g., a web page) and, thus, the web server and database module does not have to access an external device to retrieve a requested web page unlike the server 12 of Klindt.

Baker describes a control system that allows a user to access an input/output device over a communication network using a web browser. The system includes a web server 30

located within website 4. In contrast, the presently claimed invention includes a web server that is located within a web server and database module and not a web page as described in Baker.

At paragraph [0042] of Applicants' specification, several advantages are listed for providing a system that includes a database that stores a file (e.g., a web page) within a web server and database module. The system allows multiple network modules to access the same web server and eliminates the need to have multiple copies of a web page by having one database in which the web page is stored. Further, the system reduces hardware requirements, such as a web server located within each network module, by locating the web page in the web server and database module instead of locating multiple copies of the web page in network modules. The system also reduces cycle times for retrieving multiple copies of the web page because the web page is built by a web server and is sent to network modules rather than building multiple copies of the web page using a web server located within each of network modules.

Claim 1 recites a web-enabled automation control module (ACM) system including "a computer configured to send a request for a file; a network module located outside of said computer configured to receive the request for the file from said computer via a network; a database located within a web server and database module configured to store the file; a web server located within said web server and database module configured to receive the file from said network module; and an ACM central processing unit (CPU) configured to send ACM data to said web server and database module to embed ACM data in the file to facilitate transferring ACM data to said network module in response to the request, said ACM CPU coupled directly to said web server and database module."

No combination of Klindt and Baker describes or suggests the web-enabled automation control module (ACM) system as recited in Claim 1. In particular, no combination of Klindt and Baker describes or suggests an ACM system that includes a network module located outside of a computer, a web server and database module that includes a web server, and a database that stores a file (e.g., a web page). Rather, Klindt describes that a network interface (alleged network module) is located within a computer, not

outside the computer as recited in Claim 1. Further, the server described in Klindt (alleged web server and database module) allows internet access to information (e.g., web pages) stored in a program and logic controller that is located outside of the server. In contrast, the web server and database module of Claim 1 includes a database that stores a file (e.g., a web page) and, thus, the web server and database module recited in Claim 1 does not have to access an external device to retrieve a requested web page. Further, Baker merely describes a control system that includes a web server located within a website that allows a user to access an input/output device over a communication network using a web browser. In contrast, Claim 1 recites that a web server is located within a web server and database module and not a web page as described in Baker.

Accordingly, Claim 1 is submitted to be patentable over Klindt and Baker.

Claims 2-10 and 19 depend from Claim 1. When the recitations of Claims 2-10 and 19 are considered in combination with the recitations of Claim 1, Applicants submit that Claims 2-10 and 19 likewise are patentable over Klindt and Baker.

Claim 11 recites a method for managing and controlling an automation control module (ACM) system, said method including “sending a request for a file from a computer through a network to at least one network module located outside of the computer; sending the request from the at least one network module to a web server located within a web server and database module; storing the file in a database of the web server and database module; sending ACM data from an ACM central processing unit (CPU) to the web server and database module to embed the ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module; retrieving the file from the database via the web server; and transmitting the file from the web server to the computer via the at least one network module and the network.”

No combination of Klindt and Baker describes or suggests a method for managing and controlling an automation control module (ACM) system as recited in Claim 11. In particular, no combination of Klindt and Baker describes or suggests a method that includes

sending a request for a file from a computer through a network to at least one network module located outside of the computer, and sending the request from the at least one network module to a web server located within a web server and database module, wherein the file is stored in a database of the web server and database module. Rather, Klindt describes that a network interface (alleged network module) is located within a computer, not outside the computer as recited in Claim 11. Further, the server described in Klindt (alleged web server and database module) allows internet access to information (e.g., web pages) stored in a program and logic controller that is located outside of the server. In contrast, the web server and database module of Claim 11 includes a database that stores a file (e.g., a web page) and, thus, the web server and database module recited in Claim 11 does not have to access an external device to retrieve a requested web page. Further, Baker merely describes a control system that includes a web server located within a website that allows a user to access an input/output device over a communication network using a web browser. In contrast, Claim 11 recites that a web server that receives the file is located within a web server and database module and not a web page as described in Baker.

Accordingly, Claim 11 is submitted to be patentable over Klindt and Baker.

Claims 13-16 and 18 depend from Claim 11. When the recitations of Claims 13-16 and 18 are considered in combination with the recitations of Claim 11, Applicants submit that Claims 13-16 and 18 likewise are patentable over Klindt and Baker.

Claim 20 recites a method for managing and controlling an automation control module (ACM) system, the ACM system including at least one network module located outside of a computer, the at least one network module electrically connected to a network and a web server and database module electrically connected to the at least one network module and located outside the at least one network module, the method includes “receiving by the at least one network module located outside of the computer a request for a file from the computer through the network; storing the file in a database of the web server and database module; and transmitting ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the at least one

network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module.”

No combination of Klindt and Baker describes or suggests a method for managing and controlling an automation control module (ACM) as recited in Claim 20. In particular, no combination of Klindt and Baker describes or suggests a method that includes receiving by at least one network module located outside of the computer a request for a file from a computer through a network, and storing the file in a database of the web server and database module. Rather, Klindt describes that a network interface (alleged network module) is located within a computer, not outside the computer as recited in Claim 20. Further, the server described in Klindt (alleged web server and database module) allows internet access to information (e.g., web pages) stored in a program and logic controller that is located outside of the server. In contrast, the web server and database module of Claim 20 includes a database that stores a file (e.g., a web page) and thus the web server and database module recited in Claim 20 does not have to access an external device to retrieve a requested web page. Further, Baker describes a PLC CPU module that is coupled only to a web server, not a web server and database module as required in Claim 20. That is, Baker does not describe that ACM data is transmitted from an ACM CPU that is coupled directly to a web server and database module.

Accordingly, Claim 20 is submitted to be patentable over Klindt and Baker.

Claims 21-24 depend from Claim 20. When the recitations of Claims 21-24 are considered in combination with the recitations of Claim 20, Applicants submit that Claims 21-24 likewise are patentable over Klindt and Baker.

Claim 25 recites a method for managing and controlling network traffic including utilizing at least one network module and a web server and database module located outside the at least one network module, the method includes “receiving, by a first network module located outside of a computer message from the computer via a network; storing a file requested in the message in a database of the web server and database module; and transferring the message from the first network module via an automation control module

(ACM) backplane to the web server and database module to facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server and database module.”

No combination of Klindt and Baker describes or suggests a method for managing and controlling network traffic as recited in Claim 25. In particular, no combination of Klindt and Baker describes or suggests a method that includes receiving by a first network module located outside of a computer a message from the computer via a network and storing a file requested in the message in a database of the web server and database module as recited in Claim 25. Rather, Klindt describes that a network interface (alleged network module) is located within a computer, not outside the computer as recited in Claim 25. Further, the server described in Klindt (alleged web server and database module) allows internet access to information (e.g., web pages) stored in a program and logic controller that is located outside of the server. In contrast, the web server and database module of Claim 25 includes a database that stores a file (e.g., a web page) and, thus, the web server and database module recited in Claim 25 does not have to access an external device to retrieve a requested web page. Further, Baker describes a PLC CPU module that is coupled only to a web server, and not a web server and database module as required in Claim 25. That is, Baker does not describe that ACM data is transmitted from an ACM CPU that is coupled directly to a web server and database module.

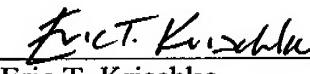
Accordingly, Claim 25 is submitted to be patentable over Klindt and Baker.

Claims 26-30 depend from Claim 25. When the recitations of Claims 26-30 are considered in combination with the recitations of Claim 25, Applicants submit that Claims 26-30 likewise are patentable over Klindt and Baker.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-11, 13-16, and 18-30 be withdrawn.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action are respectfully solicited.

Respectfully submitted,

  
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